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7 Attorneys for Defendants  
GUIDANT CORPORATION, GUIDANT SALES  
8 CORPORATION, CARDIAC PACEMAKERS, INC., and  
BOSTON SCIENTIFIC CORPORATION  
9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 SETA SAAD and CHRISTIAN E. SAAD,  
13 individually and as representatives of the Estate  
of RAYMOND SAAD,

14 Plaintiffs,

15 vs.

16 GUIDANT CORPORATION; GUIDANT  
17 SALES CORPORATION; CARDIAC  
PACEMAKERS, INC.; BOSTON SCIENTIFIC  
18 CORPORATION; ASHLEY & MCMULLEN-  
WING SUN MORTUARY, a business entity  
19 form unknown; ASHLEY & MCMULLEN, a  
business entity form unknown; and DOES 1  
20 through 20, inclusive,

21 Defendants.

Case No. C 08-0053-MEJ

DECLARATION OF MIA O.  
SOLVESSON IN SUPPORT OF MOTION  
TO STAY PENDING TRANSFER TO  
MDL COURT

Date: February 21, 2008

Time: 10:00 a.m.

Ctrm: B, 15<sup>th</sup> Floor

Judge: Magistrate Judge Maria-Elena James

Complaint filed: October 29, 2007

22  
23 I, Mia O. Solvesson, declare:

24 1. I am an attorney licensed to practice before this Court and am an associate at Shook,  
25 Hardy & Bacon L.L.P., counsel of record for Defendants Guidant Corporation, Guidant Sales  
26 Corporation, Cardiac Pacemakers, Inc., and Boston Scientific Corporation in the above-captioned  
27 matter. The following statements are within my personal knowledge and, if called to do so, I could  
28 and would testify competently thereto.

2. Attached as Exhibit A is a true and correct copy of the Judicial Panel on Multidistrict Litigation's Transfer Order establishing an MDL in the District of Minnesota ("MDL Court") and transferring a number of cases to the MDL Court dated November 7, 2005.

3. Attached as Exhibit B is a true and correct copy of the Eighty-Ninth Notice of Potential Tag-Along Actions sent to the Judicial Panel on Multidistrict Litigation on January 8, 2008.

4. Prior to filing this motion, counsel for Guidant contacted counsel for Plaintiffs to propose that the parties enter into a stipulation to stay this action pending transfer to the MDL Court. Plaintiffs' counsel, however, would not agree to stipulate to a stay of deadlines.

I declare under penalty of perjury under the laws of the United States and of California that the foregoing is true and correct. Executed on January 10, 2008 at San Francisco, California.

*/S/ Mia O. Solvesson*

MIA O. SOLVESSON